

# **Exhibit B**

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
BROWNSVILLE DIVISION**

**SPACE EXPLORATION  
TECHNOLOGIES CORP.,**

**Plaintiff,**

**v.**

**NATIONAL LABOR RELATIONS  
BOARD, a federal administrative agency,  
JENNIFER ABRUZZO, in her official  
capacity as the General Counsel of the  
National Labor Relations Board, LAUREN  
M. McFERRAN, in her official capacity as  
the Chairman of the National Labor  
Relations Board, MARVIN E. KAPLAN,  
GWYNNE A. WILCOX, and DAVID M.  
PROUTY, in their official capacities as  
Board Members of the National Labor  
Relations Board, and JOHN DOE in his  
official capacity as an Administrative Law  
Judge of the National Labor Relations  
Board,**

**Defendants.**

Civil Action No. 1:24-cv-00001

**DECLARATION OF CATHERINE L. ESCHBACH IN SUPPORT OF PLAINTIFF  
SPACEX'S OPPOSITION TO DEFENDANTS' MOTION FOR INDICATIVE RULING  
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 62.1**

Pursuant to 28 U.S.C. § 1746, I, Catherine L. Eschbach, declare as follows:

1. I am an attorney in Morgan, Lewis, and Bockius LLP's Houston, Texas office and represent Plaintiff Space Exploration Technologies Corp. ("SpaceX") in this matter. I am the Attorney-in-Charge under the local rules for this matter.

2. Attached as Exhibit 1 to this Declaration is a true and correct copy of email correspondence between myself and David Boehm, counsel for the Defendants, on May 16, 2024, about their proposed motion.

Executed on June 6, 2024, in Bolton Landing, New York.

A handwritten signature in black ink, reading "Catherine Lynn Eschbach". The signature is written in a cursive, flowing style.

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Catherine Lynn Eschbach